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RCAP

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • Stephen M. Mahfood, Director

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

April 4, 2000

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Mr. John DiGregorio
Marconi Investment Company
5200 Daggett Avenue
St. Louis, MO 63110



R00178853

RCRA RECORDS CENTER

RE: Acknowledgment of Interim Status Termination, Closure Financial Assurance Release and No Further Corrective Action for the Former SKF Facility, St. Louis, Missouri, EPA ID No. MOT 300 010 345

Dear Mr. DiGregorio:

The Missouri Department of Natural Resources' (MDNR) Hazardous Waste Program (HWP) in accordance with Section 360.395, RSMo, 40 CFR 265.1(b) and 40 CFR 270.73 as incorporated by reference in the corresponding state hazardous waste regulations, considers the former SKF St. Louis Facility's interim status as a regulated hazardous waste storage facility terminated. The MDNR also acknowledges that no further corrective action is currently necessary at the former SKF St. Louis facility pursuant to the Missouri Hazardous Waste Management Law and Regulations. The foregoing determinations are based on the following:

- At the time of the MDNR's RCRA Facility Assessment (RFA) site reconnaissance visit (SRV) on February 22, 1996, the entire site was discovered to have undergone major redevelopment. This occurred since the time of EPA's preparation of the April 13, 1992, Environmental Priorities Initiative/Preliminary Assessment (EPI/PA) report. The north and east portions of the property were found during the SRV to be occupied by residential town houses and several former SKF buildings were in use by other commercial businesses. All Solid Waste Management Units (SWMUs and Areas of Concern (AOCs) identified in EPA's EPI/PA report were eliminated as a result of demolition of several SKF buildings with the exception of AOC #2 (transformers and switch gear equipment in buildings #3 and #4). SWMU #3 (former hazardous waste drum storage area) had also been eliminated, except for the concrete floor of this area, which is still in place next to the east side of Building #4. Mr. John DiGregorio of Marconi Investment, current owner of the property, indicated that no hazardous wastes and/or facility-related manufacturing equipment has been on-site since the

purchase of the property, although formal closure of the hazardous waste storage area was never implemented by SKF due to SKF's contention that they were a protective filer of a RCRA Part A Permit Application. In a September 10, 1984, MDNR inspection report, Mr. Gaurang Shah of MDNR's St. Louis Regional Office documented evidence of hazardous waste storage in excess of 90 days during his inspection on July 12, 1984. Hence, the former SKF facility continued to be considered an interim status hazardous waste TSD facility by MDNR.

- The area of the previously demolished buildings is currently covered with asphalt pavement. Detailed information regarding the location and number of the former buildings can be found in the EPA's EPI/PA report of April 13, 1992. Due to the changes in ownership of the facility, demolition of several buildings, and redevelopment of the site, little substantive information is available regarding the exact location of past SWMUs/AOCs and the conditions/redevelopment of the facility since SKF ceased operations in 1986. Although formal closure of the storage area was never implemented and financial assurance was never provided, SKF informally closed the hazardous waste storage area, demolished several manufacturing buildings and decommissioned associated manufacturing equipment before transfer of the property. Evidence of releases of hazardous waste or hazardous constituents to soils beneath and around the hazardous waste storage area was not evident based on MDNR's confirmatory sampling and analysis conducted during preparation of the RFA addendum. Although SKF never formally closed its greater than 90 day hazardous waste storage area, nor provided associated closure financial assurance, this issue appears to be moot. The MDNR has determined that no evidence of release from the hazardous waste storage area is apparent according to MDNR's RFA sampling results and visual inspection of the former hazardous waste storage area. The MDNR hereby acknowledges that closure of the hazardous waste storage area is considered complete and that the associated closure financial assurance obligations pursuant to 40 CFR 265.143 (h), as incorporated by reference in 10 CSR 25-7.265. are hereby released.
- The final RFA Report for the former SKF facility consists of the EPI/PA report as prepared by the Environmental Protection Agency's contractor, and the RFA addendum dated September 30, 1996, as prepared by the MDNR's HWP. Based on the SRV, MDNR determined that SWMUs #1, #2, #4, #5, and AOCs #1, #3, and #4 were eliminated as a result of demolition of the buildings and

associated appurtenances and decommissioning of associated manufacturing equipment. The entire facility was further assessed relative to evidence of actual/potential release(s) during the SRV. AOC #2 remained, with no visible evidence of release, consistent with the EPI/PA report. The concrete floor of SWMU #3 (former drum storage area) was the only remaining SWMU identified during the SRV for sampling and analysis to confirm or deny the presence of a release(s).

- Former Hazardous Waste Drum Storage Area - Following the SRV, the HWP collected two soil samples directly beneath the concrete floor of the former hazardous waste storage area. These samples were analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs) and cyanide. Analytical results indicated no detection of VOCs, SVOCs, or cyanide above method detection limits, except for di-n-butylphthalate, which was detected at concentrations of 100 ug/kg and 140 ug/kg. The di-n-butylphthalate concentrations were well below potentially applicable regulatory health-based and environmental protection criteria (i.e., EPA Region III Risk Based Concentrations, MDNR's Cleanup Levels for Missouri (CALM) and Superfund's Soil Screening Levels). Although di-n-butylphthalate was not detected in any of the associated QA/QC samples, it is a common laboratory contaminant and may be associated with the plastic containers used in the laboratory. Di-n-butylphthalate is a plasticizer and has a tendency to leach from plastic containers under certain conditions.
- Following completion of all corrective action activities, copies of the complete corrective action administrative record, including EPA's EPI/PA Report and MDNR's RFA Addendum Report, for the SKF St. Louis facility were transmitted to EPA Region VII and the St. Louis public library on February 10, 2000. Thereafter, MDNR published a public (legal) notice in the St. Louis newspaper (Riverfront Times) announcing a 30-day public comment period on the MDNR's proposed interim status termination and no further corrective action determination for the facility. No comments were received during the public comment period which ended on March 16, 2000.

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- Marconi Investment Company is hereby advised that MDNR reserves the right under applicable state laws to require additional corrective action if at any time in the future, it is determined that there was/is a release of hazardous waste or hazardous constituents to the environment or information concerning the facility is determined to be invalid or inaccurate.

As previously indicated, no evidence of release from SWMU #3 or AOC #2 is apparent. All other SWMUs/AOCs at the former SKF facility have been eliminated as a result of previous site redevelopment activities. Hence, no further corrective action is required based on current information for the former SKF St. Louis, Missouri, facility.

If you have any questions concerning this letter or the subject determinations, please do not hesitate to contact Mr. Fuad Marmash or Richard A. Nussbaum, P.E., R.G., of my staff, at (573) 751-3553.

Sincerely,

HAZARDOUS WASTE PROGRAM



Cindy Kemper
Director

CK:fms

c: Ms. Patricia Murrow, U.S. EPA Region VII ✓
MDNR, St. Louis Regional Office